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February 3, 2015

Hon. Paul Gradephe
U.S. District Judge, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Lederhaus-Okun, 13-cr-560 (SDNY)

Your Honor,

I am the attorney for the Claimant, Robert Okun in the attendant forfeiture proceeding. I write, on behalf of all parties (Assistant U.S. Attorney Wilson, on behalf of Claimant United States, and Peter Rossi, Esq., on behalf of Claimant Lloyds London), to request an adjournment of the currently calendared status conference now set for Thursday, February 5th, 2015.

I have been in contact with all counsel and we are in the process of continuing with discovery and discussions. It is the belief of all counsel that an adjournment of this Status Conference for 60 days (to a new date of April 9th, 2015) will benefit all parties. At this point in time electronic discovery of emails and other documents is proceeding, and the final processing of this material may well lead to a resolution of all current litigation.

In addition, a similar request was made to Magistrate Pittman for an adjournment of the Settlement Conference, originally set for January 26, 2015; and His honor granted this request adjourning that Conference to March 23, 2015.

As Your Honor may recall, there is a collateral proceeding now ongoing in N.Y.S. Supreme Court (*Those Interested Underwriters at Lloyd's, London . . . v. Robert Okun, et al.*, 151307/2014, Supreme Court, N.Y. County, Part 17). The parties last appeared before Justice Hagler on September 22d, 2014, at which time the matter was adjourned *sine die*, pending the completion of all discovery.

Since these two cases will have to be resolved, in all likelihood, at the same time, it is the belief of all counsel that the requested adjournment to advance discovery will only lead to a quicker out of court settlement.

Your attention to this request is greatly appreciated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Bernard V. Kleinman', with a long horizontal flourish extending to the right.

Bernard V. Kleinman

Attorney for Claimant Okun

cc: All counsel of Record by email & ECF